

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re)	PROMESA
)	Title III
)	
THE FINANCIAL OVERSIGHT AND)	No. 17 BK 3283-LTS
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	(Jointly Administered)
)	
As a representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO)	Re: ECF No. 21813
<i>et al.,</i>)	Hearing date: August 17, 2022 at 9:30 a.m.
)	(Atlantic Standard Time)
)	
Debtors.¹)	
)	

**NOTICE OF FILING OF CORRECTED EXHIBIT A TO FEE EXAMINER'S REPORT
ON UNCONTESTED PRE-PRRADA PROFESSIONAL FEE MATTERS FOR
CONSIDERATION IN CONNECTION WITH THE AUGUST 17, 2022 OMNIBUS
HEARING**

The Fee Examiner respectfully files this Corrected Exhibit A (the “**Corrected Exhibit A**”), attached hereto as **Attachment One**, addressing the *Fee Examiner’s Report on Uncontested Pre-PRRADA Professional Fee Matters for Consideration in Connection with the August 17, 2022 Omnibus Hearing* [Dkt. No. 21813] (the “**Report**”).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283 LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284 LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567 LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566 LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 LTS) (Last Four Digits of Federal Tax ID: 3747) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523 LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to Software limitations).

On August 10, 2022, the Fee Examiner filed the Report with a marked Exhibit A, which was also included in Attachment 1 with the proposed order.

After the Report was filed, the Fee Examiner became aware of an error listed on Exhibit A for the expenses requested for docket number 16158 listed as line item number six on pages 5 and 16. **Attachment Two** to this notice includes the redline comparison between (1) the original Exhibit A filed on pages 5 and 16, and (2) the Corrected Exhibit A.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing notice with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system. A copy of the Corrected Exhibit A will be submitted to chambers to supplement this filing.

Dated this 11th day of August, 2022.

EDGE Legal Strategies, PSC

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Katherine Stadler (*Pro Hac Vice Approved*)

Counsel for the Fee Examiner

Attachment One

In re: The Financial Oversight and Management Board for Puerto Rico, as a representative of
 The Commonwealth of Puerto Rico, et al.
 PROMESA Title III No. 17 BK 3283-LTS

Sixth - Thirteenth Fee Period Applications Recommended:

Applicant	Compensation Period	Interim Fees Requested	Fee Examiner's Recommended Fee Adjustments	Interim Expenses Requested	Fee Examiner's Recommended Expense Adjustments		Interim Fees Recommended for Approval	Interim Expenses Recommended for Approval
Sixth Interim Fee Period (February 1 - May 31, 2019)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
1	Citigroup Global Markets Inc. [Dkt. No. 14523]	2/1 - 5/31/2019	\$ 4,300,000.00	\$ -	\$ 26,187.61	\$ 16,359.71	\$ 4,300,000.00	\$ 9,827.90
Seventh Interim Fee Period (June 1 - September 30, 2019)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
2	Citigroup Global Markets Inc. [Dkt. No. 16155]	6/1 - 9/30/2019	\$ 4,705,000.00	\$ -	\$ 813,391.60	\$ 1,828.30	\$ 4,705,000.00	\$ 811,563.30
Eighth Interim Fee Period (October 1, 2019 - January 31, 2020)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
3	Citigroup Global Markets Inc. [Dkt. No. 16156]	10/1/2019 - 1/31/2020	\$ 4,840,000.00	\$ -	\$ 1,206.00	\$ 1,206.00	\$ 4,840,000.00	\$ -
Ninth Interim Fee Period (February 1, 2020 - May 31, 2020)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
4	Citigroup Global Markets Inc. [Dkt. No. 16157]	2/1 - 5/31/2020	\$ 4,840,000.00	\$ -	\$ 9,354.30	\$ 2,331.60	\$ 4,840,000.00	\$ 7,022.70
<i>Local Counsel to the FOMB</i>								
5	O'Neill & Borges LLC [Dkt. No. 16782]	2/1 - 5/31/2020	\$ 455,558.85	\$ 924.80	\$ 509.09	\$ -	FN1	\$ 454,634.05
Tenth Interim Fee Period (June 1, 2020 - September 30, 2020)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
6	Citigroup Global Markets Inc. [Dkt. No. 16158]	6/1 - 9/30/2020	\$ 4,840,000.00	\$ -	\$ 7,115.40	\$ 3,698.40	\$ 4,840,000.00	\$ 3,417.00
<i>Local Counsel to the FOMB</i>								
7	O'Neill & Borges LLC [Dkt. No. 17660]	6/1 - 9/30/2020	\$ 283,425.75	\$ 670.18	\$ 3,968.93	\$ -	FN1	\$ 282,755.57
								\$ 3,968.93

FN1 - In light of the *Order Concerning Carlos Lamotte's Objection to Verified Statement Regarding Disinterestedness of O'Neill & Borges LLC Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act*, Filed on July 12, 2022, Docket Entry No. 21,485 [Dkt. No. 21604], the Fee Examiner has not requested adjustments premised on any deficiency in disclosure or disinterestedness. See also *Motion to Intervene and to Inform the Existence and Continuance of an Unresolvable Conflict of Interest in Violation of the Puerto Rico Recovery Accuracy in Disclosures Act of 2021*, 48 U.S.C. 2101 Et Seq., and *Petition for : (A) the Permanent Disqualification of O'Neill & Borges, LLC as Legal Counsel to the Financial Oversight and Management Board for Puerto Rico, and (B) the Disallowment [sic] and Disgorgement of Legal Fees* [Dkt. No. 20873]. Neither the disqualification motion nor the objection to the professional's PRRADA disclosures directly implicates - at least initially - the reasonableness or necessity of the professional fees recommended for Court approval here.

Attachment Two

In re: The Financial Oversight and Management Board for Puerto Rico, as a representative of
 The Commonwealth of Puerto Rico, et al.
 PROMESA Title III No. 17 BK 3283-LTS

Sixth - Thirteenth Fee Period Applications Recommended:

Applicant	Compensation Period	Interim Fees Requested	Fee Examiner's Recommended Fee Adjustments	Interim Expenses Requested	Fee Examiner's Recommended Expense Adjustments		Interim Fees Recommended for Approval	Interim Expenses Recommended for Approval
Sixth Interim Fee Period (February 1 - May 31, 2019)								
<i>Investment Banker and Financial Advisor to FOMB</i>								
1	Citigroup Global Markets Inc. [Dkt. No. 14523]	2/1 - 5/31/2019	\$ 4,300,000.00	\$ -	\$ 26,187.61	\$ 16,359.71	\$ 4,300,000.00	\$ 9,827.90
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3	Citigroup Global Markets Inc. [Dkt. No. 16156]	10/1/2019 - 1/31/2020	\$ 4,840,000.00	\$ -	\$ 1,206.00	\$ 1,206.00	\$ 4,840,000.00	\$ -
Ninth Interim Fee Period (February 1, 2020 - May 31, 2020)								
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4	Citigroup Global Markets Inc. [Dkt. No. 16157]	2/1 - 5/31/2020	\$ 4,840,000.00	\$ -	\$ 9,354.30	\$ 2,331.60	\$ 4,840,000.00	\$ 7,022.70
<i>Local Counsel to the FOMB</i>								
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6	Citigroup Global Markets Inc. [Dkt. No. 16158]	6/1 - 9/30/2020	\$ 4,840,000.00	\$ -	\$ 10,606.80 <ins>7,115.40</ins>	\$ 3,698.40	\$ 4,840,000.00	\$ 6,908.40 <ins>3,417.00</ins>
<i>Local Counsel to the FOMB</i>								
7	O'Neill & Borges LLC [Dkt. No. 17660]	6/1 - 9/30/2020	\$ 283,425.75	\$ 670.18	\$ 3,968.93	\$ -	FN1	\$ 282,755.57
								\$ 3,968.93

FN1 - In light of the *Order Concerning Carlos Lamoutte's Objection to Verified Statement Regarding Disinterestedness of O'Neill & Borges LLC Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act, Filed on July 12, 2022, Docket Entry No. 21,485* [Dkt. No. 21604], the Fee Examiner has not requested adjustments premised on any deficiency in disclosure or disinterestedness. See also Motion to Intervene and to Inform the Existence and Continuance of an Unresolvable Conflict of Interest In Violation of the Puerto Rico Recovery Accuracy in Disclosures Act of 2021, 48 U.S.C. 2101 Et Seq., and Petition for : (A) the Permanent Disqualification of O'Neill & Borges, LLC as Legal Counsel to the Financial Oversight and Management Board for Puerto Rico, and (B) the Disallowment [sic] and Disgorgement of Legal Fees [Dkt. No. 20873]. Neither the disqualification motion nor the objection to the professional's PRRADA disclosures directly implicates - at least initially - the reasonableness or necessity of the professional fees recommended for Court approval here.